

UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF SOUTH CAROLINA
COLUMBIA DIVISION

JAMES AND JOAN ASSEY,)	Civil Action No.: 3:22-cv-02647-JDA
)	
Plaintiffs,)	
)	
vs.)	AMERICAN HONDA MOTOR CO., INC.'S
)	RESPONSE TO PLAINTIFFS' RULE 26(a)(3)
)	DISCLOSURES
AMERICAN HONDA MOTOR CO, INC.,)	
)	
_____ Defendant.)	

Defendant American Honda Motor Co., Inc. ("AHM"), by and through its counsel, respectfully responds to Plaintiffs' Rule 26(a)(3) Disclosures [ECF No. 144] as follows:

A. Deposition Designations Submitted by Plaintiffs

AHM makes the following objections and/or counter-designations to the deposition designations submitted by Plaintiffs:

I. James Assey (Vol. 1).

No objections.

Counter Designations:

PAGE/LINE
9:2 through 9:24
52:18 through 52:23
66:1 through 66:7
66/18 through 68/11
69:18 through 69:24

II. James Assey (Vol. 2).

Objection to the following designation.

PAGE/LINE	OBJECTION
13:10 through 14:23	Relevance

No Counter Designations.

III. Joan Assey

No objections.

Counter Designations:

PAGE/LINE
5:20 through 6:03
24:16 through 25:21
52:16 through 54:2
85:1 through 85:13

IV. Dominick Boyce

No objections.

Counter Designations:

PAGE/LINE
13:06 through 13:17
21:24 through 23:10
28:13 through 31:07
31:18 through 31:22

V. Shayla Goldiner

Objection to the following designation.

PAGE/LINE	OBJECTION
12:11 through 12:18	Relevance/Not Testimony

Counter Designations:

PAGE/LINE
11:14 through 11:19
28:12 through 28:18
33:14 through 33:18
43:25 through 44:7
44:15 through 45:1
45:9 through 45:14
46:3 through 46:7
47:20 through 47:23

VI. Rebecca Koon

Objection to the following designation.

PAGE/LINE	OBJECTION
14:12 through 14:20	Relevance

Counter Designation:

PAGE/LINE
12:3 through 12:9

VII. Corey Kracht.

No objections and no counter designations.

VIII. Erwin Mangubat, M.D.

No objections.

Counter Designations:

PAGE/LINE
11:13 through 11:14
16:10 through 16:20
20:12 through 21:2
22:18 through 23:4

- B. The final list of exhibits intended to be used in the trial of the case with any objections noted. This list shall be served on opposing counsel.

This list is attached as **Exhibit A**, which is identical to what was submitted to the Court on April 18, 2025.

Consistent with the Court's direction [ECF No. 162], AHM will meet and confer with Plaintiffs regarding a revised list of exhibits for use at trial. AHM will submit a revised list by April 29, 2025.

Respectfully submitted,

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April 23, 2025

Columbia, South Carolina